

EXHIBIT E

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January 4, 2019

Via Electronic Mail

Leo D. Caseria

Sheppard, Mullin, Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071

Re: *Motor Vehicle Software Corp. v. CDK Global, LLC, et al.*, Case No. 1:18-cv-00865

Dear Leo:

I write this letter in response to your December 28 letter regarding MVSC discovery. To reiterate, MVSC has spent enormous time and resources responding to Defendants' discovery requests in good faith. We address the outstanding issues below.

I. Documents

Custodians. As we discussed on our meet-and-confer, MVSC continues to maintain that adding Josh Logsdon and Jamison Kingfield as document custodians is cumulative, duplicative, and unduly burdensome, especially this late in discovery. The six specific individuals who are already document custodians are more than sufficient to provide Defendants with the relevant facts regarding the independent integrators at issue in MVSC's case.

Nevertheless, in the spirit of compromise, MVSC is willing to work with Defendants to reach an agreement on this issue. Thank you for Defendants' willingness to withdraw your request to add Josh Logsdon as a document custodian if MVSC adds Jamison Kingfield. As to Mr. Kingfield, we would be willing to add him as an additional custodian limited to his capacity as General Manager of MVSC's Illinois operations. That is a reasonable compromise, addresses the basis for your request to have him as a custodian, and is consistent with the parties' practice of limiting certain custodians to topics of specific relevance to that custodian. Otherwise, we are inclined to stand on our arguments with respect to burden, timing, redundancy, and proportionality.

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Production Date Range. We disagree that MVSC's current production date range is in any way improper. Nevertheless, in the spirit of compromise, MVSC has collected and is undertaking a review of additional custodial files with an end date of December 31, 2017, and it will produce responsive documents as appropriate.

As to timing, we are endeavoring to complete production of these additional documents as promptly as possible. As Defendants have themselves professed repeatedly, however, collecting and producing thousands of documents is time-intensive and burdensome. In order to alleviate some of the additional burden and to expedite the process of completing a supplemental production, we made a modest request during our meet-and-confer to exclude MVSC's post-complaint communications with its Kellogg Hansen counsel from MVSC's privilege log. Your counter-proposal that MVSC produce *all* additional documents by January 11, 2018, in order for MVSC to exclude those communications is unreasonable, counter-productive, and not commensurate with the good faith that MVSC has been showing. MVSC will produce the documents as soon as practicable.

II. Privilege Log

Rob Cohen, Jonathan Morrison, and Auto Advisory Services Documents. MVSC has undertaken the substantial burden and re-reviewed all documents in MVSC's privilege log relating to Rob Cohen, Jonathan Morrison, and Auto Advisory Services. As appropriate, it has withdrawn its claim of privilege and/or its redactions with respect to certain documents, and produced those today.

Weideman Group Documents. MVSC has re-reviewed all documents in MVSC's privilege log relating to the Weideman Group. As appropriate, it has withdrawn its claim of privilege and/or its redactions with respect to certain documents, and it produced those documents on December 21, 2018.

Very truly yours,

s/ Christine A. Bonomo

Christine A. Bonomo